

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
The State of Texas	§	CIVIL ACTION NO. 2:21-CV-00022-Z
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	Date: July 27, 2023
	§	
<i>Plaintiffs,</i>	§	
v.	§	
Planned Parenthood Federation of America,	§	
Inc., Planned Parenthood Gulf Coast, Inc.,	§	
Planned Parenthood of Greater Texas, Inc.,	§	
Planned Parenthood South Texas, Inc., Planned	§	
Parenthood Cameron County, Inc., Planned	§	
Parenthood San Antonio, Inc.,	§	
<i>Defendants.</i>	§	

UNOPPOSED MOTION TO WITHDRAW COUNSEL

Defendants Planned Parenthood Gulf Coast, Inc. (“PPGC”), Planned Parenthood of Greater Texas, Inc. (“PPGT”) Planned Parenthood South Texas, Inc. (“PPST”); Planned Parenthood Cameron County, Inc. (“PPCC”); and Planned Parenthood San Antonio, Inc. (“PPSA”) (collectively, “Affiliate Defendants”) file this Unopposed Motion to Withdraw Counsel, Owen Dunn, in the above-styled and numbered case, and respectfully shows as follows:

1. Affiliate Defendants are represented by Arnold & Porter Kaye Scholer LLP in the above-captioned case. Its lead counsel is Tirzah Lollar.
2. Owen Dunn was previously counsel for Affiliate Defendants in the above-captioned case.
3. Mr. Dunn is no longer employed by Arnold & Porter Kaye Scholer LLP.
4. Undersigned counsel will remain counsel of record for Affiliate Defendants.

5. Plaintiffs are unopposed to this Motion.

6. Defendant Planned Parenthood Federation of America, Inc. (“PPFA”) is unopposed to this Motion.

7. For the foregoing reasons, Affiliate Defendants respectfully requests that the Court note the withdrawal of Owen Dunn as counsel of record in the above-styled and numbered case.

Dated: July 27, 2023

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Tirzah S. Lollar

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Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County,
and Planned Parenthood San Antonio*

CERTIFICATE OF CONFERENCE

On July 27, 2023, I conferred with counsel for the State of Texas, Will Wassdorf, who indicated that the State of Texas is unopposed to this motion. I also conferred with counsel for Relator, Andrew Stephens, who indicated that Relator is unopposed to this motion. I also conferred with counsel for PPFA, Danny S. Ashby, who indicated PPFA Defendant is unopposed to this motion.

/s/ Tirzah S. Lollar
Tirzah S. Lollar

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of July, 2023, I caused the foregoing to be served by email through the Court's Electronic Case Filing system upon all attorneys of record.

/s/ Tirzah S. Lollar
Tirzah S. Lollar